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October 4, 2018

**By Electronic Filing**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

On Tuesday, October 2 and Wednesday, October 3, 2018, Leonard Steinberg, General Counsel of Alaska Communications, and Karen Brinkmann and myself, both outside counsel to Alaska Communications, met in separate meetings with: (1) Dr. Jay Schwarz, Wireline Advisor to Chairman Ajit Pai; (2) Arielle Roth, Wireline Legal Advisor, and Kagen Despain, Legal Intern, to Commissioner Michael O'Rielly; (3) Jamie Susskind, Chief of Staff to Commissioner Brendan Carr; (4) Travis Litman, Chief of Staff and Senior Legal Advisor, Wireline and Public Safety, to Commissioner Jessica Rosenworcel; and (5) Suzanne Yelen, Cha-Chi Fan, Cathy Zima, Stephen Wang, and Rodger Woock of the Wireline Competition Bureau.

During the meetings, we discussed issues raised in the recent Petition for Reconsideration or Clarification filed jointly by USTelecom – the Broadband Association, ITTA - The Voice of America's Broadband Providers, and the Wireless Internet Service Providers Association in the above-referenced docket regarding Connect America Fund ("CAF") performance metrics and compliance testing requirements. We urged the Bureau to clarify that, for CAF compliance purposes, service providers must demonstrate compliance with the minimum CAF-required speed, regardless of whether the service provider is advertising or selling service that offers a higher transmission speed. We also urged the Bureau to consolidate the CAF speed and latency testing frameworks, and to align the penalty structure for any non-compliance with latency requirements with that adopted for non-compliance with the CAF speed requirements.

In addition, we urged the Bureau to modify its decision not to consider any speed test result that exceeds the provider's advertised service speed by a specific percentage. We explained that such a mandate creates disincentives for providers to strive to continually improve service, and that there could be many valid reasons why a test result showing actual speed substantially in excess of advertised speed may nevertheless be accurate. As one example, we pointed out that Alaska Communications plans to fulfill its CAF broadband deployment obligations using fixed wireless technology, and that we may see considerable variability in the speed test results we observe utilizing this new technology.

Please direct any questions regarding this matter to me.

Very truly yours,

Richard R. Cameron  
*Counsel to Alaska Communications*

cc: Jay Schwarz  
Arielle Roth  
Kagen Despain  
Jamie Susskind  
Travis Litman  
Suzanne Yelen  
Cha-Chi Fan  
Cathy Zima  
Stephen Wang  
Rodger Woock